

## OCS - Supplier Sustainability Code of Conduct

This supplier code of conduct ("Code") defines the principles and standards that OCS and its subsidiaries ("our Company") expect suppliers of goods and services to understand and adhere to.

The Code aligns to our principles and standards that we expect of our Company's employees and to what our customers expect of us. OCS sets the standards for our suppliers to meet the above code and work ethically, responsibly and with integrity to fulfil their commitment to us.

OCS expects all vendors, contractors, consultants, service providers and suppliers who do business with OCS across Australia and New Zealand to comply with this Supplier Code in both letter and spirit.

Each Supplier is expected to communicate these expectations through to its suppliers, sub-contractors, service-providers, agents and representatives who are working on OCS business.

Non-adherence to this Supplier Code will be a factor in considering whether OCS will continue to do business with the Supplier, in accordance with applicable OCS policies and procedures.

If you see or hear something that breaches the OCS Code of Conduct, you can report any concerns by contacting your local SafeCall service on the freephone number below.

Each number is listed in full, so you don't need to enter any other dialling codes.

NZ- 00 800 72 33 22 55    AUS- 1800 312 928

..... [INSERT COMPANY NAME] has read OCS's Supplier Sustainability Code of Conduct. Having read the Code, we (tick an option);

- ☐ Agree to the principles of the Code and consider we are meeting the principles.
- ☐ Agree to the principles of the Code and consider we are meeting *most* of the principles. We will work with OCS to address any gaps.
- ☐ Do not agree to the principles of the Code

Ngā mihi,

Signed for and on behalf of [COMPANY]: .....

By [NAME AND TITLE]: .....

Signature: .....

Date:.....

**OCS expects its Suppliers to conduct business legally, responsibly, ethically, with integrity, honestly and transparency. Suppliers are expected by OCS to adhere to the following principles:**

1. Practicing/ Accepting / Promoting OCS TRUE Values of - Trust, Respect, Unity and Empowerment in all their dealing with OCS and its representatives.
2. Diversity and inclusion matter to us – that’s why we insist on a fair work environment free from discrimination and harassment.

At OCS, we are committed to a work environment free from harassment and other offensive or disrespectful conduct. Harassment is unwelcome verbal, visual or physical behaviour that creates an intimidating, offensive or hostile work environment.

OCS Suppliers shall create a work environment for employees, contractors, and business partners with a secure and healthy atmosphere of mutual respect and dignity. Harassment is unacceptable, including unwelcome verbal, visual, physical, or other conduct of any kind that creates an intimidating, offensive or hostile work environment. Discrimination on the grounds of sex, marital status, religious or ethical belief, colour, race, ethnic or national origin, disability, age, political opinion, employment or family status or sexual orientation is unacceptable.

3. We set the expectation with our suppliers that they conduct business ethically and with integrity with the intent to prevent acts of modern slavery (including child labour) and human trafficking. OCS Suppliers must:
  - a. Provide fair and equitable wages, benefits and other conditions of employment in accordance with local laws
  - b. Consistent with applicable law, OCS Suppliers will respect employees’ rights to join or refrain from joining unions, associations, and other worker organisations.
  - c. Provide humane and safe working conditions, including safe, clean and sanitary housing conditions as per applicable laws
  - d. Under no circumstances shall a Supplier (themselves or their subcontractors) permit children to perform work that exposes them to undue physical risks that can harm physical, mental, or emotional development or improperly interfere with their schooling needs.
4. Collective efforts with our Suppliers to improve how we assess and address potential areas of modern slavery risk in supply chains.

In addition to ensuring that OCS Suppliers have operations that are entirely free from all forms of modern slavery practices, we are committed to improving our overall supply chain transparency, and to more effectively assessing and addressing areas of potentially elevated modern slavery risk. To achieve this, we recognise that collaborative partnership with our Suppliers is essential.

OCS Suppliers commit to:

- a. Working collaboratively with OCS to identify and rectify any gaps in its existing approaches to modern slavery risk assessment, supplier due diligence, and risk mitigation, and to pursuing a continuous improvement approach to their overall modern slavery response framework.
- b. Improving overall levels of transparency in relation to their own supply chains, with a particular focus on identifying and assessing:
  - i. areas with potential elevated risks (based on industry category and/or geographical factors), and
  - ii. going beyond first-tier suppliers and pursuing visibility deep into the raw material extraction and manufacturing stages, where the greatest risk areas may exist.
- c. Sharing relevant information and insights (anonymised as is commercially appropriate) with OCS about any aspect of identified modern slavery risk in its supply chains, such as the results of key supplier audits (whether “desk-based” or in-person).
- d. Pursuing an approach to modern slavery due diligence and risk mitigation that seeks to go beyond ‘mere compliance’ with any applicable reporting requirements (such as under the *Modern Slavery Act 2018* (Cth)) , and is proportionally adapted for practical impact relative to the assessed level of risk and its proximity to the OCS Supplier’s own operations

5. Everyone in OCS deserves to go home safe every day.

**Our Health and safety golden rules**

**Stop and say no if:**

- You believe it’s not safe to do the job
- You believe the site isn’t safe
- You believe the equipment is faulty or you don’t have the correct equipment
- You’re not trained to do the job or don’t feel competent
- You see something that could cause injury

In OCS health and safety is our number one priority and we’re committed to continuously monitoring, developing and strengthening our safety culture.

OCS Suppliers shall proactively manage health and safety hazards and risks to provide a safe environment where occupational injuries and illnesses are prevented. Suppliers must implement management systems and controls that identify hazards and assess, and control risk related to their specific industry and local safety regulations and strive towards international good practice. At OCS, we care for one other. We must all play our part in building a resilient work culture

6. Commitment to the Environment.

OCS’s aim is to reduce our impact on the environment, including factors contributing to climate change, through a commitment to continual improvement, complying with environmental legislation and regulations in the jurisdictions where our Company operates. We promote reduction of waste through elimination of packaging and encourage reuse and recycling throughout our operations. We seek to conserve resources and minimise waste where possible and make efficient use of water, energy, and raw materials and avoid deforestation. We expect our suppliers to adhere to similar standards of environmental excellence.

7. Security of personal data and commercial information.

At OCS, we respect the privacy of all our colleagues and other stakeholders, and the confidentiality of personal data including information related to individuals, such as employees (past and present), job applicants, customers, suppliers and other business partners.

In addition, there is company data and information such as customer lists and operating manuals, as well as other business and marketing material, ideas, designs, databases and records.

Suppliers may receive confidential information as part of their business relationships with OCS. This confidential information must not be shared with anyone else unless pre-authorized by OCS in writing. If a Supplier believes it might have been given unauthorised access to OCS's confidential information, the Supplier is expected to immediately notify its OCS relationship manager and refrain from further distribution of such information.

Suppliers will observe all their obligations under any applicable law or regulation regarding privacy or protection of personal data including without limitation maintaining appropriate safeguards for the protection of above information. Suppliers will co-operate with OCS in responding to any enquiry made or investigation or assessment of personal data initiated by an audit authority.

8. Intellectual Property rights

OCS expects the use and protection of intellectual property in a manner consistent with the property rights of the owner. The Supplier acknowledges that intellectual property used or embodied in or in connection with OCS and its brands is and will remain the sole property of OCS. The Supplier will not do anything which will in any way jeopardise, derogate from or otherwise infringe OCS's intellectual property.

9. At OCS, we won't tolerate bribery and corruption.

Bribery means offering, promising, giving, requesting or accepting a corrupt or improper financial or other advantage with the aim of influencing the decision-making of another person. This could consist of a payment, gift, loan, fee, voucher, travel and/or entertainment expense, meal, service, discount, offers of employment, charitable donation or political contribution. Corruption is dishonest, fraudulent or illegal behaviour by people in positions of power for personal gain. Bribery is a form of corruption. Small, unofficial 'facilitation' payments to ensure or speed up necessary actions are also a type of bribery – so they are prohibited too. OCS is committed to conducting business legally and ethically ensuring compliance with the U.S. Foreign Corrupt Practices Act, UK Bribery Act and all other applicable local laws prohibiting bribery or corrupt practices.

10. We must record and report Conflict of Interest.

All relationships or interests which may present an actual or potential conflict of interest must be disclosed in writing and approved by the relevant OCS manager. This includes any personal relationships between a Supplier staff member and OCS staff member or elected officials in jurisdictions in which OCS operates (including familial and romantic relationships and close personal friendships). Suppliers are prohibited from providing or offering gifts to OCS employees where the acceptance of a gift or hospitality may lead to a real, potential, or perceived conflict of interest.